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November 22, 2023

VIA ECF

Hon. Cathy Seibel
Federal Building and United States Courthouse
300 Quarropas Street
White Plains, New York 10601-4150

**Re: *The Wave Studio, LLC v. General Hotel Management Ltd. et al.*,
Case No. 7:13-cv-09239-CS-PED**

Dear Judge Seibel:

We are counsel for British Airways PLC in the matter *The Wave Studio, LLC v. British Airways PLC, et al.*, Case no. 7:15-cv-07950-CS, which has been consolidated with the above-captioned case. We write pursuant to your November 7, 2023 Order (D.I. 296) requesting that Defendants state their positions as to Plaintiff's contemplated motion to lift the stay.

To the extent that the Singapore Action completely resolved all of the relevant claims between Plaintiff and Defendant General Hotel Management, British Airways does not object to the Court lifting the stay. We understand from Plaintiff's November 7, 2023 letter to the Court (D.I. 295), that Plaintiff considers the Singapore action "complete" and that it claims to have "decidedly won the Singapore Action." (D.I. 295 at 2). However, Plaintiff's letter and cited support do not describe the full scope of the Singapore Action and, in particular, whether Wave Studio's claims were resolved with respect to each of the images at issue in this consolidated case.

In the event the Court lifts the stay, British Airways will be prepared at the November 29 conference to discuss how it wishes the case to proceed. We respectfully request the Court's permission to attend the November 29 pre-motion conference telephonically.

Regards,

A handwritten signature in blue ink, appearing to read 'WILL FRANKEL', with a stylized flourish extending to the right.

William H. Frankel
Counsel for British Airways

WHF/jmm